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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SITE 35 DRAFT PROPOSED PLAN NAS WHITING FIELD FL  
7/26/2006  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

**From:** [Benedikt.Craig@epamail.epa.gov](mailto:Benedikt.Craig@epamail.epa.gov)  
**To:** [Mike.Jaynes@ttnus.com](mailto:Mike.Jaynes@ttnus.com); [sarah.reed@navy.mil](mailto:sarah.reed@navy.mil); [smithl@ttnus.com](mailto:smithl@ttnus.com)  
**Subject:** Fw: Site 35 PP  
**Date:** Thursday, August 03, 2006 4:09:50 PM  
**Attachments:** [35PP0706.doc](#)

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Here's Jim Cason's Site 35 PP comment letter.

Craig A. Benedikt  
Senior Remedial Project Manager  
Federal Facilities Branch  
U.S EPA Region 4  
(404) 562-8555  
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----- Forwarded by Craig Benedikt/R4/USEPA/US on 08/03/2006 03:07 PM

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"Cason, James"  
<[James.Cason@dep.state.fl.us](mailto:James.Cason@dep.state.fl.us)>  
To  
Craig Benedikt/R4/USEPA/US@EPA  
07/26/2006 04:44 PM  
cc  
Subject  
Site 35 PP

Craig:

I am sending the attached letter up for co-signatures.

<<35PP0706.doc>>

Jim Cason

James H. Cason, P.G.  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Twin Towers Building, MS 4535  
Tallahassee, FL 32399-2400

Telephone: 850-245-8999

The four Golden Rules for site assessment/remediation:

For soil, delineate completely and dig to "clean," or dig out what you will and take confirmatory samples to prove you dug to "clean."

Delineate all contamination in all media vertically and horizontally.

For LUC sites, if for the Industrial scenario, delineate to Residential (not necessarily the site boundary originally designated).

Now, after all this, don't forget leachability.

On Geochemical Protocols:

"Alternative approaches in which data are pooled and then attempts are made to sort specific samples into either 'background' or 'affected' categories have serious problems and should be avoided."

"It is important that site soil and background soil samples be matched as closely as possible with respect to the geochemistry of trace metals being considered."

"Taking background samples locally will satisfy requirements in Chapter 62-780, F.A.C., which defines 'background concentrations' for use in risk assessment as coming from samples taken 'in the vicinity' of the site."

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail is communications and may therefore be subject to public disclosure.

(See attached file: 35PP0706.doc)



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

July 26, 2006

Ms. Sarah Reed  
Naval Facilities Engineering Command  
2155 Eagle Drive, PO Box 190010  
North Charleston, South Carolina 29419-9010

file: 35FS0706.doc

RE: Draft Proposed Plan: OU 22, Site 35, Building 1429, Public Works Maintenance Facility,  
Surface and Subsurface Soil, NAS Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated June 2006 (received July 11, 2006). Please adequately address the following in the final document:

1. The document has presented the recommendation of Land Use Controls for the Site. In his review of the Feasibility Study, Mr. Craig Benedikt requested that engineering controls in the form of concrete cover maintenance be evaluated as part of Alternative 2. I also suggested that digging and soil removal restrictions also be evaluated under Alternative 2. These may need to be incorporated into the document.
2. On page 3, following the discussion of Land Use Controls, the statement is made that "The USEPA and the FDEP concur with the NFA recommendation. This is erroneous. Please correct this statement.
3. I previously expressed concern about the use of the term "subsurface" soil, in that I was not sure that "subsurface" was the proper descriptor and I suggest that a clarifying statement be added in this and subsequent documents that explains why "subsurface" soil was the only contaminated horizon and that because of the cover, the soil directly beneath was called subsurface soil. Please note that the proposed remedy on page 3 is for "Surface" and "Subsurface" Soils. Please insure that the Feasibility Study and the Proposed Plan soil references are correct and consistent.

Ms. Sarah Reed  
November 13, 2008  
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If you need additional information or further clarification, please feel free to call me at 850-245-8999.

Sincerely,

James H. Cason, P.G.  
Remedial Project Manager

CC: Craig Benedikt, US EPA Region IV, Atlanta  
Ron Joyner, NAS Whiting Field  
Larry Smith, Tetra Tech, Tallahassee

ESN\_\_\_\_\_JJC\_\_\_\_\_